



## Filing Receipt

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**PUC DOCKET NO. 51841**

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| <b>REVIEW OF 16 TAC §25.53</b>      | <b>§</b> | <b>PUBLIC UTILITY COMMISSION</b> |
| <b>RELATING TO ELECTRIC SERVICE</b> | <b>§</b> |                                  |
| <b>EMERGENCY OPERATIONS PLANS</b>   | <b>§</b> | <b>OF TEXAS</b>                  |

**INITIAL COMMENTS OF THE CITY OF HOUSTON**

The City of Houston (Houston) respectfully submits these comments in response to the proposed replacement of 16 TAC §25.53 relating to the Public Utility Commission of Texas (PUC or Commission) Electric Service Emergency Operations Plans.

Houston is appreciative of the PUC in their attempts to develop Emergency Operations Plans (EOP) during an emergency event or incident that endangers life, property, or the continuity of electric service. These EOPs also include specific curtailment/load shedding paradigms that will ensure the reliability of electric service to critical infrastructure during an emergency event. These EOPs and load shedding and restoration plans are also critical for Houston in their response to these emergency events as the City's response to events includes supporting and collaborating with the utility's restoration of service to all customers in the City and maintaining emergency and human needs services during the event.

**After Action Summary Reports**

Houston proposes that all after action summary reports as described in paragraph (c) Filing Requirements, after an event where the EOP was used, the transmission and distribution utility (TDU), retail electric provider (REP), or other applicable entity, include details on any critical infrastructure that was only partially or not fully served by the provider, why it was not, and changes to address the issues. This detail may be included in a confidential or non-public version

of the after action report and should be directly communicated after the event to the critical infrastructure owner.

### **Updates to EOPs, Load Shed Annexes and Communications Plans**

Houston proposes that prior to an update of an EOP, or any annexes thereof, for an REP or TDU, the entity should notify affected critical infrastructure customers and communicate changes prior to the filing of the updated EOP with the PUCT. This shall provide an opportunity for the critical infrastructure owners to provide initial feedback to improve or refine the EOP or annex changes. Similarly, in paragraph (d)5, Communication Plan, prior to changing or developing the communication plan, the entity should coordinate with local governments and critical infrastructure owners for input and refinement of the communication plan prior to its submittal with the EOP.

When the load shed annex and registry is updated annually, the entity should notify the critical infrastructure customers and local governments prior to submittal to the PUCT. This provides an opportunity to coordinate, refine and improve the load shedding annex and ensure critical or human needs services are maintained. The entity should also notify the critical infrastructure owners if the load shedding priorities change with any of the specific annexes.

### **Drills**

When an entity performs a drill as defined in paragraph (f), the entity should contact and coordinate all drills with the applicable local governments and / or agencies affected or noted in the EOP and annex prior to executing the drill. This ensures the entity and local governments, and agencies properly coordinate their responses, plans, and communications.

Respectfully Submitted

CITY OF HOUSTON, TEXAS

DocuSigned by:

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BUSINESS REPRESENTATIVE FOR THE  
CITY OF HOUSTON, TEXAS

## **City of Houston's Executive Summary for PUCT Project No. 51841**

- After action summary reports should be directly communicated to critical infrastructure customers and include details on any critical infrastructure that was only partially or not fully served by the provider, why it was not, and changes to address the issues.
- A REP or TDU should:
  - Notify affected critical infrastructure customers and communicate changes prior to the filing of the updated EOP with the PUCT.
  - Coordinate with local governments and critical infrastructure owners for input and refinement of changes or updates to the communication plan prior to its submittal with the EOP.
  - Notify the critical infrastructure customers and local governments when the load shed annex and registry is updated annually, prior to submittal to the PUCT.
  - Notify the critical infrastructure owners if the load shedding priorities change with any of the specific annexes.
  - Contact and coordinate with the applicable local governments and / or agencies affected or noted in the EOP the drills as defined in paragraph (f).